

January 14, 2022

Via ECF

Honorable Lorna G. Schofield
U.S. District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*
Case No. 1:13-cv-07789-LGS

Dear Judge Schofield:

Pursuant to the Seventh Amended Civil Case Management Plan and Scheduling Order entered in this action (ECF No. 1454), Plaintiffs and Credit Suisse Securities (USA) LLC, Credit Suisse Group AG, and Credit Suisse AG (“Credit Suisse”) submit this joint status letter.

I. Motions

After reaching agreement on the scope of redactions, and in accordance with the Court’s Orders regarding the same (ECF Nos. 1592, 1595), the parties filed their cross-motions for summary judgment in unredacted form with the Court on May 20, 2021 (ECF No. 1594) and redacted form on the public docket on June 4, 2021 (ECF Nos. 1596-1606). As a result, briefing on, and filing of, the parties’ summary judgment motions is complete.

II. Discovery

A. Depositions

Depositions have concluded. In total, Credit Suisse took 27 depositions of the Plaintiffs and/or their investment advisors. Plaintiffs took 55 fact depositions, two objector depositions, and eight Rule 30(b)(6) depositions of Defendants, including Credit Suisse. Of the 55 fact depositions taken by Plaintiffs, 26 witnesses invoked the Fifth Amendment protection against self-incrimination. In addition, the parties took and defended 14 expert depositions.

B. Remaining Deadlines

There are no other remaining discovery deadlines.

III. Litigation Class Notice

Plaintiffs have completed disseminating notice to potential Class Members that have been identified in the records maintained by the Claims Administrator. On November 29, 2021, the Court entered an Order Approving Requests for Exclusion from the Certified Litigation Class. ECF No. 1632.

Honorable Lorna G. Schofield
January 14, 2022
Page 2

IV. Next Joint Status Letter

The parties will submit their next joint status letter on Friday, March 11, 2022.

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS
AT LAW LLP

HAUSFELD LLP

s/ Christopher M. Burke
Christopher M. Burke
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: 619-233-4565
cburke@scott-scott.com

s/ Michael D. Hausfeld
Michael D. Hausfeld
888 16th Street NW, Suite 300
Washington, DC 20006
Telephone: 202-540-7200
mhausfeld@hausfeld.com

Attorneys for Plaintiffs

CAHILL GORDON & REINDEL LLP

s/ Jason M. Hall
David G. Januszewski
Herbert S. Washer
Elai Katz
Jason M. Hall
Sheila C. Ramesh
32 Old Slip
New York, NY 10005
Telephone: 212-701-3000
djanuszewski@cahill.com
hwasher@cahill.com
ekatz@cahill.com
jhall@cahill.com
sramesh@cahill.com

Attorneys for Defendants
Credit Suisse Group AG, Credit Suisse AG,
and Credit Suisse Securities (USA) LLC